

JOSEPH P. RUSSONIELLO (CSBN 44332)  
United States Attorney

BRIAN J. STRETCH (CSBN 163973)  
Chief, Criminal Division

ALLISON MARSTON DANNER (CSBN 195046)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-7144  
FAX: (415) 436-7234  
[Email: allison.danner@usdoj.gov](mailto:allison.danner@usdoj.gov)

Attorneys for the United States

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

|                           |   |                              |
|---------------------------|---|------------------------------|
| UNITED STATES OF AMERICA, | ) | No. CR 07-0716 MHP           |
|                           | ) |                              |
| Plaintiff,                | ) | STIPULATION AND [PROPOSED]   |
|                           | ) | ORDER EXCLUDING TIME FROM    |
| v.                        | ) | SPEEDY TRIAL ACT CALCULATION |
|                           | ) | (18 U.S.C. § 3161(h)(8)(A))  |
| PETER LASELL,             | ) |                              |
|                           | ) |                              |
| Defendant.                | ) |                              |

With the agreement of the parties in open court, and with the consent of defendant Peter Lasell, the Court enters this order documenting exclusion of time from January 28, 2008 through February 25, 2008 under the Speedy Trial Act, 18 U.S.C. § 3161(c)(1). The parties agree, and the Court finds and holds, as follows:

1. Defendant made his initial appearance before this Court on November 26, 2007. The parties appeared before this Court for a status conference on January 28, 2008. At the status conference on January 28, 2008, both counsel requested a further status date of February 25, 2008 in order to allow defense counsel to review discovery related to defendant's computer and to conduct further forensics investigation. In light of these discovery issues, the parties jointly requested an exclusion of time under the Speedy Trial Act in order for defense

STA Stipulation  
CR 07-0716 MHP

1 counsel to prepare effectively for this case.

2 2. Defendant agreed to an exclusion of time under the Speedy Trial Act. Failure to  
3 grant the requested continuance would unreasonably deny defendant the reasonable time  
4 necessary for effective preparation, taking into account the exercise of due diligence, in this case  
5 The Court found that the ends of justice served by excluding the period from January 28, 2008  
6 through February 25, 2008 from Speedy Trial Act calculations outweigh the best interest of the  
7 public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(8)(A) & (B)(iv).

8 3. Accordingly, and with the consent of the defendant at the appearance on January  
9 28, 2008, the Court ordered that the period from January 28, 2008 through February 25, 2008 be  
10 excluded from Speedy Trial Act calculations. *Id.*

11 IT IS SO STIPULATED.

12  
13 DATED: January 28, 2008

\s\  
\_\_\_\_\_  
JONATHAN D. MCDOUGALL  
Attorney for Defendant

14  
15 DATED: January 28, 2008

\s\  
\_\_\_\_\_  
ALLISON MARSTON DANNER  
Assistant United States Attorney

16  
17  
18 IT IS SO ORDERED.

19  
20 DATED: \_\_\_\_\_

\_\_\_\_\_  
HONORABLE MARILYN HALL PATEL  
United States District Judge